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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES,

Plaintiff,

vs.

HAO ZHANG, ET AL.,

Defendants.

Case No.: CR 15-00106 EJD

**DEFENDANT'S UNOPPOSED REQUEST
FOR ONE-TIME MODIFICATION OF
RELEASE CONDITIONS**

Defendant hereby submits this unopposed, one-time request to modify Defendant's release conditions to permit him to attend a Lunar New Year celebration on the evening of February 7, 2016, from 3:00 p.m. to 10:00 p.m., at the home of his attorney Yitai Hu in Menlo Park, California.

Defense counsel has spoken with Assistant US Attorney Matthew Parrella, who has stated that he does not oppose this request.

1 Defense counsel has also spoken with Mr. Zhang's Pretrial Services officer, Kim Do, who
2 does not oppose this modification. However, the Pretrial Services Office requested that this
3 modification be formalized through a Court order.

4 Defendant submits a proposed order accompanying this request.
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8 Dated: February 5, 2015

NOLAN BARTON BRADFORD & OLMOS LLP

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11 Daniel B. Olmos
12 Attorney for Defendant Hao Zhang
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4 **UNITED STATES DISTRICT COURT**
5 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
6 **SAN JOSE DIVISION**

7 UNITED STATES,

8 Plaintiff,

9
10 v.

11 HAO ZHANG, ET AL.,

12 Defendants.
13

Case No.: CR 15-00106 EJD

**[PROPOSED] ORDER TO MODIFY
RELEASE CONDITIONS**

14 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that Defendant Zhang's
15 release conditions shall be modified to permit him to attend a Lunar New Year celebration the
16 evening of February 7, 2016, from 3:00 p.m. to 10:00 p.m. in Menlo Park, California, at the home of
17 his attorney, Yitai Hu. All other conditions of release shall remain the same.
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20 Dated:

The Hon. Edward J. Davila
United States District Judge
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